

**THE ROSEN LAW FIRM, P.A.**

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[Proposed] Lead Counsel for Plaintiff and Class

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
EDWARD S. GUTMAN, Individually and on Behalf of All      **No.: 1:15-cv-07192 (CM)**  
Others Similarly Situated,

Plaintiff,

vs.

Robert F.X. Sillerman, D. Geoffrey  
Armstrong, John Miller, Michael John Meyer,  
and SFX Entertainment, Inc.,

Defendants.  
-----X

**NOTICE OF MOTION OF  
DAVID CHAN TO: (1)  
APPOINT LEAD  
PLAINTIFF; AND (2)  
APPROVE LEAD  
PLAINTIFF'S SELECTION  
OF COUNSEL**

**CLASS ACTION**

**PLEASE TAKE NOTICE** that pursuant to Section 21D of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Plaintiff David Chan ("Movant") hereby moves this Court, the Honorable Colleen McMahon, United States District Judge, for an order:

- (a) appointing Movant to serve as Lead Plaintiff in this action; and
- (b) approving Movant's selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movant submits: (1) Memorandum of Law dated November 10, 2015 (and exhibits); and (2) a [Proposed] Order granting Movant's Motion to appoint Lead Plaintiff, and approving Lead Plaintiff's selection of Counsel.

Respectfully submitted,

Dated: November 10, 2015

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim

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[Proposed] Lead Counsel for Plaintiff and Class

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of November, 2015, a true and correct copy of the foregoing **NOTICE OF MOTION OF DAVID CHAN TO: (1) APPOINT LEAD PLAINTIFF; AND (2) APPROVE LEAD PLAINTIFF'S SELECTION OF COUNSEL** was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim